

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: George Anthony Ladner
Amity Rachelle Ladner, Debtors**

**Case No. 19-50566-KMS
Chapter 13**

**DEBTOR'S CERTIFICATION AND MOTION FOR ENTRY OF CHAPTER 13
DISCHARGE PURSUANT TO 11 U.S.C. §1328 (a) and (h)**

This motion seeks an order discharging the debtor(s) pursuant to § 1328(a) of the bankruptcy code. If you oppose this motion, you must file a response with the court within twenty-one (21) days from the date listed below in the certificate of service. Your response must set forth the specific factual allegations with which you disagree, and a copy of your response must be served on the debtor(s) and debtor's(s') attorney. If no timely response is filed, the court may grant this motion without holding a hearing. A timely response is necessary for a hearing to be held.

1. By signing below, the debtors certify under penalty of perjury that the following statements are true and correct:
 - A. For cases filed on or after March 10, 2008, we have completed a personal financial management instructional course provided through an agency approved by the United States Trustee and have filed the certificate of completion provided by the course provider (in a joint case, both husband and wife must each complete the course and file a certificate of completion) or the approved personal financial management course provider has notified the court that we have completed a post-petition instructional course concerning personal financial management. **11 U.S.C. § 1328(g)**
 - B. All pre-petition amounts owed by me on domestic support obligation ("Domestic Support Obligation" as defined at 11 U.S.C §101(14A)), if any, have been paid to the extent provided by the plan. All post-petition amounts owed by me on a domestic support obligation, if any, have been paid. **11 U.S.C §1328(a)**
 - C. We have not received a discharge under chapter 7, 11 or 12 of the Bankruptcy Code in a prior case filed during the four-year period preceding the date that the petition was filed in this case. **11 U.S.C. §1328(f)(1)**
 - D. We have not received a discharge under chapter 13 of the Bankruptcy Code in a prior case filed during the two-year period before the date that the petition was filed in this case. **11 U.S.C. §1328(f)(2)**
 - E. We have not been convicted of a felony, the circumstances of which would demonstrate that the filing of this bankruptcy case constituted an abuse of the provisions of the Bankruptcy Code. **11 U.S.C. §1328(h)(1) and §522(q)(1)(A)**
 - F. If we owe a debt arising from: (i) any violation of any State or Federal securities laws, regulations or orders, (ii) fraud, deceit or manipulation in a fiduciary capacity or in connection with the purchase or sale of any security, (iii) a civil remedy under 1964 of Title 18 of the United States Code, or (iv) that caused serious injury or death to another individual in the preceding five (5) years, in the preceding five (5) years, then we have not claimed an exemption for my/our residence in an amount in excess of the statutory

cap as prohibited by §522(q)(1) of the Bankruptcy Code. **11 U.S.C. §1328(h)(1) and §522(q)(1)(B)**

G. No proceeding is pending in which we may be found guilty of a felony of the kind described in §522(q)(1)(A) or in which we may be found liable for a debt of the kind described in §522(q)(1)(B). **11 U.S.C. §1328(h)(2)**

H. We have made all payments required by my confirmed Chapter 13 plan.

2. Debtors hereby move the court for the entry of a discharge order in this case.

Signed: /s/ George Anthony Ladner
George Anthony Ladner

08/27/2025
Date

/s/ Amity Rachelle Ladner
Amity Rachelle Ladner

08/27/2025
Date

/s/ Thomas C. Rollins, Jr
Thomas C. Rollins, Jr., MS Bar No. 103469
Attorney for the Debtors
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
601.500.5533

08/29/2025
Date

3. Mailing address for filing responses:

Jackson Office:
Danny L. Miller, Clerk
United States Bankruptcy Court
Thad Cochran US Courthouse
501 E Court St, Ste 2.300
Jackson, MS 39201

Gulfport Divisional Office:
Danny L. Miller, Clerk
United States Bankruptcy Court
Dan M. Russell, Jr. U.S. Courthouse
2012 15th St, Suite 244
Gulfport, MS 39501

CERTIFICATE OF SERVICE

On August 29, 2025, a copy of this pleading was served on each of the persons listed on the attached service list either by prepaid United States mail or via electronic service through the Court's EM/ECF system at the mailing addresses and/or email addresses indicated.

/s/ Thomas C. Rollins, Jr
Thomas C. Rollins, Jr.

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4 UNITED STATES BANKRUPTCY COURT
5 SOUTHERN DISTRICT OF MISSISSIPPI

6 IN RE:

7 GEORGE ANTHONY LADNER
8 AMITY RACHELLE LADNER

CASE NO: 19-50566-KMS

**DECLARATION OF MAILING
CERTIFICATE OF SERVICE**

Chapter: 13

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11 On 8/29/2025, I did cause a copy of the following documents, described below,
12 Notice and Motion for Entry of Chapter 13 Discharge

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18 to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with
19 sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and
incorporated as if fully set forth herein.

20 I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.
21 com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to
22 Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if
fully set forth herein.

23 Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been
served electronically with the documents described herein per the ECF/PACER system.

24 DATED: 8/29/2025

25 /s/ Thomas C. Rollins, Jr.
26 Thomas C. Rollins, Jr. 103469
27 Attorney at Law
The Rollins Law Firm
702 W. Pine Street
Hattiesburg, MS 39401
601 500 5533
28 trollins@therollinsfirm.com

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4 UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

5 IN RE:

6 GEORGE ANTHONY LADNER
7 AMITY RACHELLE LADNER

CASE NO: 19-50566-KMS

**CERTIFICATE OF SERVICE
DECLARATION OF MAILING**

Chapter: 13
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11 On 8/29/2025, a copy of the following documents, described below,
12 Notice and Motion for Entry of Chapter 13 Discharge
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19 were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient
20 postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth
herein.

21 The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above
22 referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of
Service and that it is true and correct to the best of my knowledge, information, and belief.

23 DATED: 8/29/2025
24
25



26 Miles Wood
27 BK Attorney Services, LLC
28 d/b/a certificateofservice.com, for
Thomas C. Rollins, Jr.
The Rollins Law Firm
702 W. Pine Street
Hattiesburg, MS 39401

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING
NCRS ADDRESS DOWNLOAD
CASE 19-50566-KMS
SOUTHERN DISTRICT OF MISSISSIPPI
FRI AUG 29 8-9-1 PST 2025

~~EXCLUDE~~

~~US BANKRUPTCY COURT
DAN M RUSSELL JR US COURTHOUSE
2012 15TH STREET SUITE 244
GULFPORT MS 39501-2036~~

1ST FRANKLIN FINANCIAL CORPORATION
ATTN ADMINISTRATIVE SERVICES
PO BOX 880
TOCCOA GA 30577-0880

CITI CARDS
PO BOX 790345
SAINT LOUIS MO 63179-0345

DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
PO BOX 7346
PHILADELPHIA PA 19101-7346

FIRST FRANKLIN
11010 OLD HWY 49
STE 2
GULFPORT MS 39503

FIRST NATIONAL BANK OF OMAHA
CO BQ ASSOCIATES PC LLO
14211 ARBOR ST STE 100
OMAHA NE 68144-2312

FROSTARNETT CO
PO BOX 1280
OAKS PA 19456-1280

GOODYS
PO BOX 659465
SAN ANTONIO TX 78265-9465

GRAND BANK
14 PLAZA DR
HATTIESBURG MS 39402-1312

GRAND BANK FOR SAVINGS FSB
POST OFFICE BOX 16988
HATTIESBURG MS 39404-6988

GULF COAST COMM FCU
2120 25TH AVE
GULFPORT MS 39501-4518

GULF SOUTH SURGERY CEN
1206 31ST AVE
GULFPORT MS 39501-1804

HEATH WILSON
15121 MELTON RD
GULFPORT MS 39503-9567

HOME DEPOT
PO BOX 9001010
LOUISVILLE KY 40290-1010

HUNTINGTON NATIONAL BA
PO BOX 182519
COLUMBUS OH 43218-2519

INTERNAL REVENUE SERVI
CO US ATTORNEY
501 EAST COURT ST
STE 4430
JACKSON MS 39201-5025

JACKSON COUNTY ANESTHE
PO BOX 789
OCEAN SPRINGS MS 39566-0789

KEESLER FEDERAL CREDIT
PO BOX 7001
BILOXI MS 39534-7001

MRG LLC
22C DOCTORS DR
OCEAN SPRINGS MS 39564-5721

MICHAEL A JACOB II
PO BOX 948
OXFORD MS 38655-0948

NAVIENT
PO BOX 740351
ATLANTA GA 30374-0351

NAVIENT SOLUTIONS LLC ON BEHALF OF
ASCENDIUM EDUCATION SOLUTIONS INC
PO BOX 8961
MADISON WI 53708-8961

NAVIGATOR CREDIT UNION
PO BOX 1647
PASCAGOULA MS 39568-1647

(P)PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067

QUANTUM3 GROUP LLC AS AGENT FOR
COMENITY BANK
PO BOX 788
KIRKLAND WA 98083-0788

(P)REPUBLIC FINANCE LLC
282 TOWER RD
PONCHATOULA LA 70454-8318

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

SYNCHRONY BANK
PO BOX 105972
ATLANTA GA 30348-5972

THE FIRST NATIONAL
PO BOX 2496
OMAHA NE 68103-2496

THE HUNTINGTON NATIONAL BANK
PO BOX 89424
CLEVELAND OH 44101-6424

US ATTORNEY GENERAL
US DEPT OF JUSTICE
950 PENNSYLVANIA AVENW
WASHINGTON DC 20530-0001

~~EXCLUDE~~

~~UNITED STATES TRUSTEE
501 EAST COURT STREET
SUITE C 430
JACKSON MS 39201 5022~~

AMITY RACHELLE LADNER
15095 CEMETERY RD
GULFPORT MS 39503-9264

DEBTOR

GEORGE ANTHONY LADNER
15095 CEMETERY RD
GULFPORT MS 39503-9264

~~EXCLUDE~~

~~THOMAS CARL ROLLINS JR
THE ROLLINS LAW FIRM PLLC
PO BOX 13767
JACKSON MS 39236 3767~~

~~EXCLUDE~~

~~(P) WARREN A CUNTZ T1 JR
PO BOX 3749
GULFPORT MS 39505 3749~~